

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

EUGENIA KALOUDIS, Individually,	:	
and as Administratrix of the Estate	:	
of GEORGE KALOUDIS, Deceased	:	
	:	
vs.	:	CIVIL ACTION NO. 02-CV-4482
	:	
STAR TRANSPORT, INC.	:	
and BRIAN L. MILES	:	

**MOTION FOR EXTENSION OF TIME FILED ON BEHALF
OF DEFENDANTS, STAR TRANSPORT, INC. AND BRIAN MILES**

Defendants, Star Transport, Inc. and Brian Miles, by and through their counsel, Rawle & Henderson, LLP, hereby move the Court to extend all case management deadlines, and in support thereof avers as follows:

1. Plaintiff, Eugenia Kaloudis filed a Complaint against Defendants, Star Transport, Inc. and Brian L. Miles on or about June 18, 2002.
2. Defendants, Star Transport, Inc. and Brian L. Miles removed the matter to federal court pursuant to 28 U.S.C. § 1441 on July 8, 2002.
3. Defendants, Star Transport, Inc. and Brian L. Miles filed an Answer to the Complaint on August 1, 2002.
4. Defendants substituted counsel on October 30, 2002.
5. All parties agreed to resubmit discovery demands in accordance with the federal rules in November of 2002.

6. Plaintiff served her First Set of Interrogatories and Request for Production of Documents on or about November 25, 2002.

7. Defendants served their First Set of Interrogatories and Request for Production of Documents on or about November 19, 2002.

8. As of this date, defendants have not received responses to their demands

9. The discovery deadline is January 21, 2003.

10. Defendants tried to contact plaintiff's counsel prior to the discovery deadline in furtherance of seeking a unanimous motion. However, defendants were unable to raise this issue with plaintiff's counsel until January 21, 2002. At that time, he did not consent to an extension of time.

11. Plaintiff's discovery is outstanding.

12. Plaintiff's counsel could not advise when the outstanding discovery would be provided.

13. Accordingly, defendants will be severely prejudiced by closing discovery prior to receiving and having the opportunity to respond to plaintiff's discovery responses.

14. Defendants seek a reasonable extension of time (60 days) for all case management deadlines.

WHEREFORE, Defendants respectfully requests this Court enter the attached Order granting its Extension of Time.

RAWLE & HENDERSON LLP

By: _____
Timothy J. Abeel, Esquire
Identification No. 23104
Kirsten E. Moore, Esquire
Identification No. 88699
The Widener Building
One South Penn Square
Philadelphia, PA 19107
215-575-4200
Attorneys for Defendants,
Star Transport, Inc. and Brian Miles

DATED: January 22, 2003

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Motion to Extend Time, was served on this date by First Class U.S. mail, postage prepaid to the following counsel of record.

A. Roy DeCaro, Esquire
Raynes, McCarty, Binder, Ross & Mundy
1845 Walnut Street, 20th Floor
Philadelphia, PA 19103

RAWLE & HENDERSON LLP

By: _____
Timothy J. Abeel, Esquire
Identification No. 23104
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One South Penn Square
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CIVIL ACTION NO. 02-CV-4482

ORDER

AND NOW, this day of , 2003, upon consideration of Defendants, Star Transport, Inc. and Brian L. Miles' Motion for Extension of Time, it is hereby **ORDERED** and **DECREED** that said Motion is **GRANTED**. All Case Management Deadlines are Extended for 60 days. A new Case Management Order will be issued.

BY THE COURT:

J.